TECHNICAL EXHIBIT

AMENDMENT TO PENDING

APPLICATION FOR CONSTRUCTION PERMIT

DTV STATION WUGA

TOCCOA, GEORGIA

CH 24 100 KW (MAX-DA) 395 M

### Loss Area Analysis

The technical statement addresses the loss area that would be created by the relocation of WUGA-DT from its present transmitter site (See FCC License BLCDT-20090127AAN) to a new transmitter site (See FCC File Number: BPCDT-20100827AAS). The application proposes to relocate WUGA by moving its transmitter site 51 kilometers (32 miles), decreasing the effective radiated power and increasing the antenna height above average terrain.

Figure 1 is a map showing the gain and loss areas that would be created by this facility modification. Figure 2 is a map showing the other services that would be available in the loss area. For the other services, only (1) licensed non-commercial (educational) full-service stations and (2) licensed TV translators whose licensee is that of a non-commercial (educational) entity were considered. As shown by the map, no part of the loss would have fewer than 2 licensed educational services remaining. Therefore, no educational "white" (no services remaining) or "grey" (only one service remaining) is predicted to occur.

 $<sup>^{1}</sup>$  The standard FCC propagation curves using the licensed facility parameters were employed to calculate the coverage contours. For full-service stations, the noise-limited contour was calculated. For TV translators, the Part 74 protected contour values were used to define the contours.

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Below is a tabulation of the loss and gain area statistics. All population values are from the 2000 U.S. Census. All service areas are based upon the noise-limited contour.

Existing Service

Population: 847,000 persons

Area:  $15,950 \text{ km}^2$ 

Proposed Service

Population: 1,805,000 persons

Area:  $20,970 \text{ km}^2$ 

Loss Area

Population: 208,000 persons

11.5% of Proposed Service Population

Area:  $3,730 \text{ km}^2$ 

17.8% of Proposed Service Area

Loss Area by State

Georgia

Population: 4,000 persons

0.2% of Proposed Service Population

Area:  $275 \text{ km}^2$ 

1.3% of Proposed Service Area

North Carolina

Population: 23,000 persons

1.3% of Proposed Service Population

Area:  $1,260 \text{ km}^2$ 

6.0% of Proposed Service Area

South Carolina

Population: 181,000 persons

10.0% of Proposed Service Population

Area:  $2,195 \text{ km}^2$ 

10.5% of Proposed Service Area

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#### Gain Area

Population: 1,166,000 persons

64.6% of Proposed Service Population

Area:  $8,750 \text{ km}^2$ 

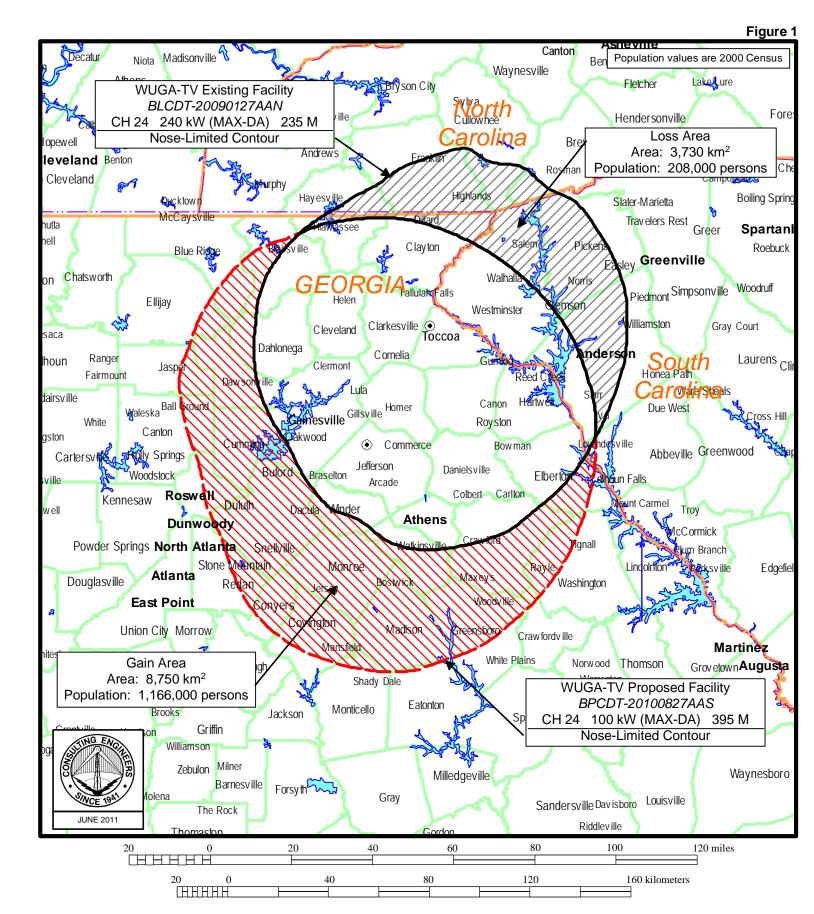
41.7% of Proposed Service Area

The WUGA-TV loss area within the state of Georgia contains 4,000 persons. Of that area, 1,555 persons is served by the operating W12DK-LP, whose licensee is the Georgia Public Telecommunications Commission. The remaining loss area containing 2,445 persons would be served by educational stations located outside the state of Georgia.

Charles A. Cooper

June 13, 2011

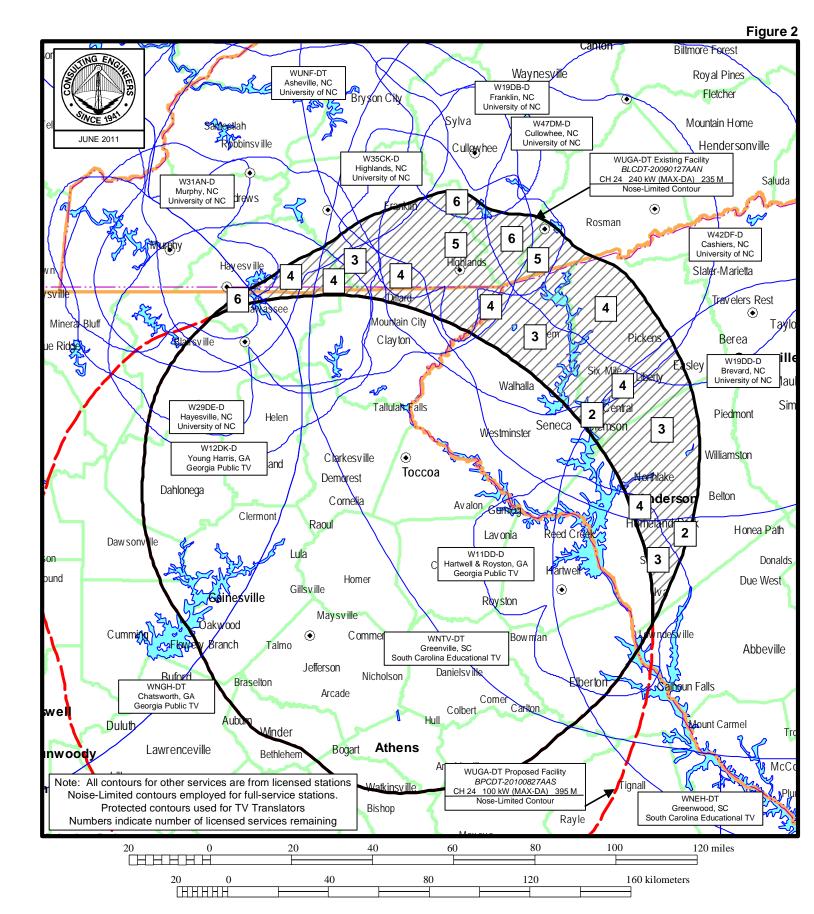
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## **WUGA LOSS AREA ANALYSIS**

APPLICATION FOR CONSTRUCTION PERMIT WUGA-DT TOCCOA, GEORGIA CH 24 100 KW (MAX-DA) 395 M

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# OTHER NON-COMMERCIAL TELEVISION SERVICES IN LOSS AREA

APPLICATION FOR CONSTRUCTION PERMIT WUGA-DT TOCCOA, GEORGIA CH 24 100 KW (MAX-DA) 395 M

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